June 30, 2008

Ms. Jennifer Sutter
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Subject: **Swan Island Upland Facility, Operable Unit 3**
No Further Action Determination Request
ECSI No. 271

Dear Ms. Sutter:

On July 27, 2006, the Port of Portland (Port) submitted a No Further Action (NFA) Determination request to the Oregon Department of Environmental Quality (DEQ) for Operable Unit 3 (OU3) at the Swan Island Upland Facility (SIUF). The Voluntary Agreement for Remedial Investigation, Source Control Measures, and Feasibility Study (Agreement) between the Port and DEQ for the SIUF defines OU3 as land owned by the Port and leased by Freightliner at 5420 N. Lagoon Avenue in Portland, Oregon, and the adjacent strip of land to the north that borders Swan Island Lagoon and provides vehicle access to Berth 308. On August 14, 2006, DEQ responded to the Port's request for an NFA determination by asking the Port to provide additional documentation. The Port provided the additional documentation requested by DEQ in a letter dated March 20, 2007. On November 30, 2007, DEQ requested that additional information be provided following a site visit to OU3. DEQ's comments are presented in italics, followed by the Port's response.

1. *The July 25, 2006 OU3 No Further Action Determination Request describes stormwater runoff from the site as either flowing to the southwest toward North Lagoon Avenue or to the northeast onto an adjacent parcel of Port-owned property. It further states that stormwater on the adjacent parcel is collected by 6 drains that each discharge to Swan Island Lagoon. Based on observations from Berths 307 and 308, there appears to be more than 6 outfalls on the site discharging to Swan Island Lagoon and the maps included with this report seem to indicate that the "adjacent parcel" on which the catch basins are located is actually part of OU3. Further clarification on the boundaries of OU3 and field checking the number of catch basins and associated outfalls from the property should be completed.*

   As was stated in our July 27, 2006 NFA request, OU3 consists of the 1.7-acre parcel of property located at 5420 North Lagoon Avenue and the adjacent approximately 0.3 acre narrow strip of property that extends to the northeast to the ordinary high water line for Swan Island Lagoon (see Figure 1). The parcel of property at 5420 North Lagoon Avenue includes an office/warehouse building and is almost entirely paved with asphalt. The adjacent parcel includes a paved roadway that provides vehicle access to Berth 308 and contains no structures. The Port surveyed the paved portions of OU3, and field verified the number and location of each catch basin (see Figure 1). The Port also determined that each catch basin has a wire basket to collect large debris and that each

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catch basin is connected to a 10 to 12-inch corrugated metal pipe outfall that discharges to Swan Island Lagoon. There are no other outfalls from the property other than the building roof drains which are connected to a storm sewer that runs along N. Lagoon Avenue.

2. *A petroleum sheen was observed in Swan Island Lagoon along the entire length of the property which appeared to more significant at the north end adjacent to the outfalls discharging from the truck parking area. The potential that this sheen is originating from stormwater discharged from the property should be evaluated. The following information should be provided:*
    a. *An accurate map illustrating the facility's stormwater drainage system. Facility stormwater drainage data should include: catch basins, drainage basins, stormwater lines, outfalls (or connections to off-site shared conveyance lines), and stormwater flow directions.*

        Figure 1 illustrates the stormwater drainage system for OU3, including catch basin locations, Swan Island Lagoon outfall locations, and stormwater flow directions. As is indicated by this figure, all of the catch basins are located on OU3 and most of the runoff from the paved areas flows to one of the six catch basins. Based on the land survey, runoff from the driveways and paved areas near N. Lagoon Avenue may discharge as sheet flow to catch basins along N. Lagoon Avenue.

    b. *Current stormwater controls (preventative and control measures) and best management practices employed to reduce releases of contaminants from the site via stormwater discharge. Booms were observed around the catch basins and along the edge of the parking area on the northern portion of the property; however, they were very new. The length of time the booms had been present at these locations should be documented and whether they had replaced previous booms or are a new practice indicated [sic].*

        On December 21, 2007, Freightliner (the lessee of all but the 0.3 acre access road of OU3) retained West Coast Marine to pump the catch basins and install "diapers" adjacent to their service yard. The catch basins on OU3 are now included in their annual catch basin maintenance program. According to Freightliner the booms observed by DEQ were installed on November 27, 2007; they were new booms that replaced previously existing booms. Finally, Freightliner has placed a spill containment kit in the shop area and implemented an employee awareness and training program.

    c. *The schedule for cleaning catch basins and associated discharge lines and any data available on the cleanouts. This would include volume and characteristics of material removed, available sampling results, and disposal procedures.*

        As was stated above, the catch basins were cleaned on December 21, 2007 and will be cleaned on an annual basis by Freightliner. Freightliner did not provide any information on the volume and characteristics of the materials removed from the catch basins, sampling results, or disposal procedures.

3. *DEQ recommends developing a catch basin sampling plan for this property to assess whether solids present pose a source of contamination to Swan Island Lagoon. It may be efficient to combine this effort with the next scheduled catch basin cleaning if that will occur in the near future. Analytes of interest would include petroleum hydrocarbons, metals, polycyclic aromatic hydrocarbons (PAHs), phthalates, and polychlorinated biphenyls (PCBs).*

   Current and historical operations do not reveal an ongoing source of contaminants available for transport via storm water to the Swan Island Lagoon. Regardless, the Port will complete a storm water conveyance system cleanout followed by a storm water evaluation. The conveyance system cleanout will include the following.

   - Solids present in the conveyance system inlets will be removed prior to the cleanout and drummed for offsite disposal. A representative composite sample from the drummed solids will be analyzed for the list of analytes proposed by the DEQ.
   - The conveyance piping will be cleaned with a high-pressure water jet.
   - The rinsate and sediments will be collected via vacuum truck and transported directly to Cascade General for disposal.

   Prior to offsite disposal of the rinsate, the vacuum truck will be allowed to settle for approximately half an hour. Solids samples obtained from each vacuum truck which will be composited into one sample for chemical analysis. The composite sediment sample will be analyzed for the list of analytes proposed by the DEQ.

   Following the conveyance system cleanout, the Port will collect whole-water grab samples during four representative storm events. A storm event will be considered representative consistent with the Storm Event Criteria and Selection outlined in the Joint Source Control Strategy. The storm water samples will be analyzed for the list of analytes proposed by the DEQ.

4. *Mitigation of the sheen likely originating from the property outfalls should be evaluated. Placement of booms around each outfall might help to resolve the question of whether the outfalls are the source or if the sheen is originating elsewhere in the lagoon and migrating to this location.*

   As was discussed during the site visit, the Port is not convinced that the sheen originated from the OU3 outfalls. It is much more likely that the sheen was due to releases from ship traffic or other more significant stormwater discharges to Swan Island Lagoon. Swan Island Lagoon is part of the working Portland Harbor where incidental petroleum releases are common. Because the lagoon has limited inflows and essentially no current, it is not surprising that sheen might accumulate near the shoreline of OU3 if the wind was blowing in the right direction.

   In late January 2008, Freightliner removed "oil" residue around a recycle container storage area and the trail under the fence.

Also, a significant amount of what appeared to be solid waste (e.g., booms, broken dock facilities, and a small boat) was observed along the shoreline of the property. This material should be removed from the lagoon and properly disposed.

The DEQ notified the Oregon Department of State Lands (DSL) of this observation. The Port followed up with Mr. Cyril Young of DSL regarding DEQ's observations as well. As you know, DSL has oversight responsibility for these matters.

Please give me a call if you have any questions regarding our responses to your comments.

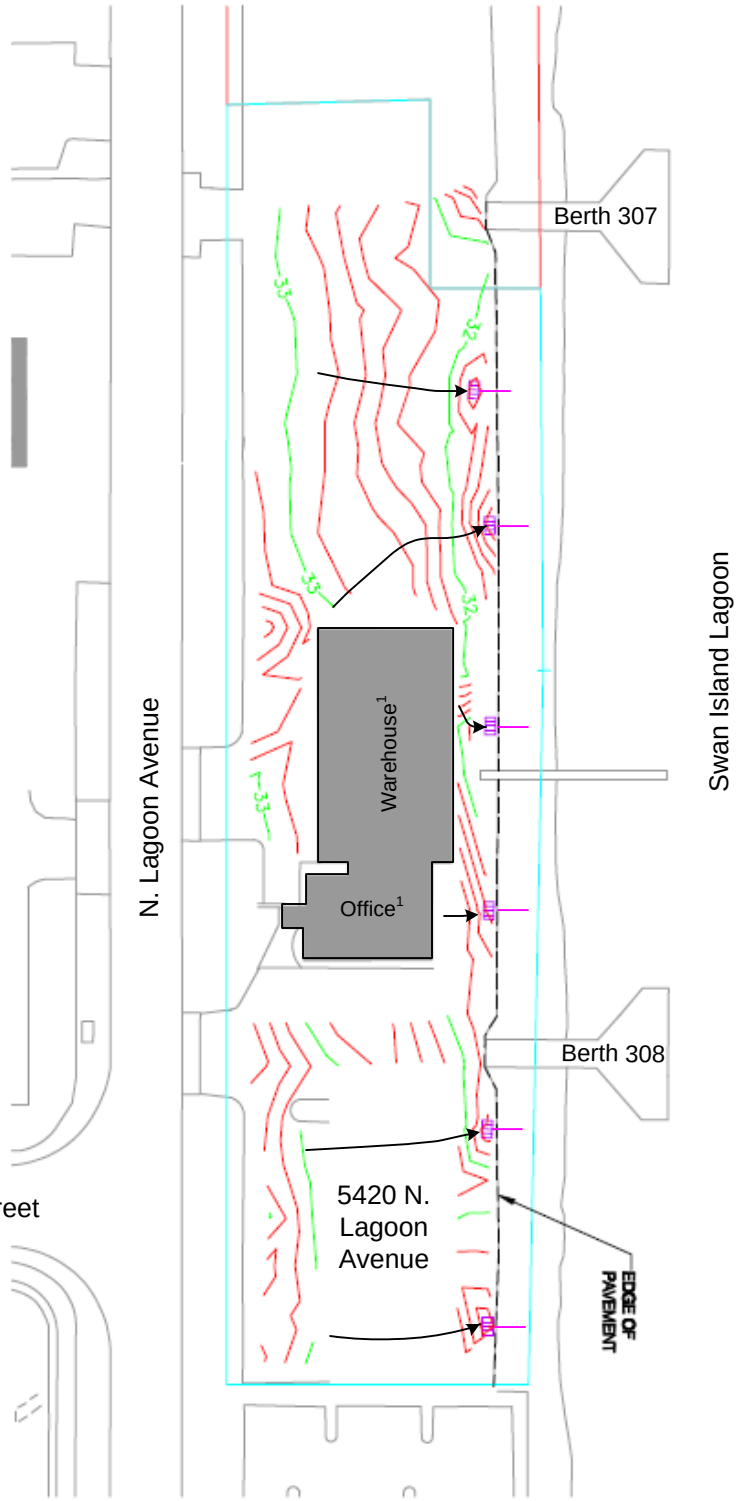
Sincerely,

Nicole LaFranchise

Nicole LaFranchise
Environmental Project Manager

Enclosure: Figure 1: Operable Unit 3 Stormwater System, Swan Island Upland Facility

c: Kristine Koch, EPA
David Ashton, Port
Suzanne Barthelmess, Port
Richard Vincent, Port
Michael Pickering, Ash Creek Associates
Mark Lewis, NewFields
Stu Brown, Bridgewater
LWP File



[1] Building roof drains are connected to a storm sewer that runs along N. Lagoon Avenue. Runoff from paved areas mainly discharges to inlets with baskets connected to 10- to 12-inch corrugated metal pipes. Runoff from driveways and paved areas near N. Lagoon Avenue may discharge by sheet flow to catch basins along N. Lagoon Avenue.

Legend:
- Operable Unit 3 Boundary
- Inlet and Outfall Pipe
- Approximate Stormwater Flow Direction

100 feet

Approximate Scale

Figure 1

Operable Unit 3 Stormwater System
Swan Island Upland Facility

BRIDGEWATER GROUP, INC.